

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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11 | Attorneys for Plaintiff Marlowe Patent Holdings LLC

MARLOWE PATENT HOLDINGS LLC,

Plaintiff,

V.

15 DICE ELECTRONICS, LLC; PACIFIC
16 ACCESSORY CORPORATION; PRECISION
17 INTERFACE ELECTRONICS, INC.; LTI
ENTERPRISES, INC. D/B/A USA SPEC; and
VAIS TECHNOLOGY.

Defendants.

Case No. 2:10-cv-01199-PGS-ES

REPLY TO COUNTERCLAIMS

Marlowe Patent Holdings LLC (hereinafter referred to as “Plaintiff”), by its attorneys, Zimmerman & Levi, LLP and Kaplan, Gilman & Pergament, LLP, as and for its Reply to the Counterclaims of defendant LTI Enterprises, Inc. (“defendant”) replies as follows:

1. Plaintiff admits the allegations contained in paragraph 28 of the Counterclaims.
 2. Plaintiff admits the allegations contained in paragraph 29 of the Counterclaims.
 3. Plaintiff admits the allegations contained in paragraph 30 of the Counterclaims.
 4. Plaintiff denies the allegations contained in paragraph 31 of the Counterclaims.
 5. Plaintiff denies the allegations contained in paragraph 32 of the Counterclaims

1 **WHEREFORE**, plaintiffs pray that this Court:

- 2 A. Dismiss defendant's Counterclaims with prejudice;
- 3 B. Deny defendant all relief prayed for in the Counterclaims;
- 4 C. Declare that plaintiff's U.S. Patent No. 7,489,786 ("the '786 patent") is valid and
5 enforceable;
- 6 D. Declare that the '786 patent is infringed by the defendant;
- 7 E. Enter a final judgment on the Counterclaims, resolving the issues in favor of
8 plaintiff;
- 9 F. Direct such other and further relief as the Court may deem just and proper.

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12 By: /s/Jean-Marc Zimmerman

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Attorneys for Plaintiff Marlowe Patent Holdings LLC

Date: April 30, 2010
Westfield, New Jersey

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2 **CERTIFICATE OF SERVICE**
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I, Jean-Marc Zimmerman, hereby certify that on April 30, 2010, I served plaintiff Marlowe
Patent Holdings LLC's Reply to defendant LTI Enterprises, Inc.'s Counterclaims on defendants'
counsel by delivering the same to Thomas F. McGuane, Esq., McElroy, Deutsch, Mulvaney &
Carpenter, LLP, 100 Mulberry Street, Newark, NJ 07102 by e-mail addressed to tmcguane@mdmc-
law.com.

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9 /s/Jean-Marc Zimmerman
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